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FILED

FEB 20 2024

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: LEGAL RECOVERY LLC

) Bankruptcy Court Case No: 24-30074 DM 11

Debtor

)
) DECLARATION OF JOANNE ENG IN
) SUPPORT OF HER MOTION TO
) CONVERT DEBTOR'S CHAPTER 11 INTO
) CHAPTER 7 PURSUANT TO 11 U.S. CODE
) § 303(a) AND/OR TO APPOINTMENT OF
) TRUSTEE OR EXAMINER PURSUANT TO
) 11 U.S. CODE § 1104

)
)
) Hearing Date: March 29, 2024

) Time: 1:30 pm

) Judge: Hon. Dennis Montali

) Place: 450 Golden Gate Ave.,
16 Floor, Court Rm. 17
San Francisco, CA 94102

I, Joanne Eng, declare:

1. I am part owner to the Lombard Street Property. I submit this declaration in support of my Motion to Convert Debtor's Chapter 11 to Chapter 7. I have personal knowledge of the facts attested herein, and if I were called to testify about these matters, I would be competent to and would do so.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Order of Contempt issued by Hon. Judge Dennis Montali of this Bankruptcy Court on January 4, 2015.

1
2 I declare under penalty of perjury under the law of the United States that the above is true
3 and correct, and that this declaration is executed at Las Vegas, this 17th day of February 2024.
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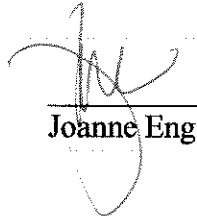
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6 Joanne Eng
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Exhibit A



1 JOAN M. CHIPSER (SBN83192)
2 1 Green Hills Court
3 Millbrae, CA 94030
4 Telephone: (650) 697-1564
5 FAX: (650) 873-2858
6 email: joanchipser@sbcglobal.net

Signed and Filed: January 4, 2015


DENNIS MONTALI
U.S. Bankruptcy Judge

Attorney for Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

LOMBARD FLATS, LLC,

Debtor.

Case No.: 09-32219
(Chapter 11)

ORDER OF CONTEMPT

Date: December 19, 2014
Time: 10:00 a.m.
Ctmm: 22

The Motion of Reorganized Debtor For Order of Contempt For Violation of 11 U.S.C. §524(a)(2) and For Sanctions came on for hearing before the above-signed Bankruptcy Judge on the above date and time. Joan M. Chipser appeared for the Reorganized Debtor ("Debtor").

Demas Wai Yan, aka, Dennis Yan, appeared for himself. The court having considered all papers filed in support and in opposition to the Motion and having considered the argument of counsel and upon due consideration, and for the reasons stated on the record, makes the following order:

IT IS HEREBY ORDERED that Demas Wai Yan, aka, Dennis Yan, is in contempt for violation of Bankruptcy Code Section 524(a)(2);

IT IS HEREBY FURTHER ORDERED that Demas Wai Yan shall dismiss the Debtor from the San Francisco Superior Court case of *Legal Recovery, LLC vs. Martin Lee Eng, Lombard Flats, LLC, et al.*, Case No. CGC-14-542378 within 10 days of the date of this Order;

1 **IT IS HEREBY FURTHER ORDERED** that Demas Wai Yan shall pay to the Debtor's
2 attorney, the sum of \$2,150 as reimbursement for attorney's fees and costs incurred in
3 connection with the contempt within 10 days of the date of this order.

4 **IT IS HEREBY FURTHER ORDERED** that if Demas Wai Yan does not comply with
5 the terms of this order, the Debtor may file another contempt motion against him.
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8 ****END OF ORDER****
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